

DEPARTMENT OF BOATING AND WATERWAYS

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September 17, 1999

Mr. Lester Snow
CALFED Bay-Delta Program
1416 Ninth Street, Ste. 1151
Sacramento, California 95814

Dear Mr. Snow:

Subject: CALFED Bay Delta Program
Comments on DEIR/EIS

After reviewing the proposed final draft of the subject DEIR/EIS, the Department of Boating and Waterways (Cal Boating) submits the following comments for your consideration.

- We are concerned that under the DEIR/EIS
 - (a) boating activities are identified primarily as stressors, and
 - (b) the possible impacts of stressor reduction on boating and measures to be taken to mitigate these impacts are only addressed programmatically.

Our apprehension with this approach is that the attention needed to resolve recreational issues in the Delta will be overlooked in the progression of events, following the Record of Decision in June 2000, to further effect levee, water transport, flood control, farming and ecosystem restoration projects and programs. Consequently, we feel that CALFED, within the DEIR/EIS, should identify recreation (including recreational boating) as a stakeholder. In short, Cal Boating requests, at the programmatic level, a compulsory recreational planning element in all projects and programs.

- We are of the opinion that a Delta Recreation Master Plan (DRMP) should be the basis for decisions implementing both recreational and non-recreational projects and programs. We ask that a programmatic element be included in the DEIR/EIS to require the timely development of a DRMP. Boating and Waterways is currently conducting two studies that could help to bring about such a plan:

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- (1) A boating facilities needs assessment study is underway that will gather user data, determine baseline conditions of boating and related recreation, and project facilities needs to 2005, 2010 and 2020. Included in this effort are public workshops, focused workshops with special interest groups, mailed boater surveys, mailed marina owner/operator surveys and boater intercept surveys. An econometric model will be developed for predicting future boating facility needs based upon estimated changes in future economic conditions, population and boat registrations. The study will be completed in May 2000.
- (2) A Delta Vessel Traffic Study is currently being conducted for the Department by the University of Southern California. The study includes a boat-use survey, traffic analysis, modeling and map-based displays to define the present recreational boating patterns in the delta. An important part of this study consists of direct measurements of boat traffic in different, representative parts of the Delta, and during all seasons of the year.

The Department is most willing to work with CALFED and other appropriate parties in preparing a Delta Recreation Master Plan.

- The DEIR/EIS does not address the requirements of the Davis-Dolwig Act of 1961, which specifies that planning for public recreation use is to be part of project formulation for activities in connection with State-sponsored water projects. No such component is included in the description of the CALFED conveyance project elements. The DEIR/EIS should include reference to the Davis-Dolwig Act of 1961, and include a recreation component for the CALFED program.
- The DEIR/EIS proposes projects that will create shallow water environments that could potentially be conducive to the growth of *Egeria densa*. Cal Boating feels that the DEIR/EIS should recognize such potential and acknowledge the need to modify projects to eliminate this problem or provide appropriate mitigation measures.

To conclude, we would note that this Department has and will continue to be involved in the CALFED Bay Delta process - we have and will provide administrative, technical and financial assistance to local, State, federal and private sector entities in the Delta. Through Cal Boating's various grant, loan and capital outlay programs, a variety

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of boating facilities needs can be identified and met. Further, we can provide assistance with respect to operational issues encompassing boating safety, education, law enforcement and aquatic weed control.

We thank you for the opportunity to offer these comments. Please contact us if we may be of assistance to you and your staff.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carlton Moore".

Carlton D. Moore
Interim Director